

No. 03-20-00129-CV

**IN THE THIRD COURT OF APPEALS
AUSTIN, TEXAS**

FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS
10/9/2020 11:47:27 AM
JEFFREY D. KYLE
Clerk

**QATAR FOUNDATION FOR EDUCATION, SCIENCE AND
COMMUNITY DEVELOPMENT,
*Appellant,***

v.

**KEN PAXTON, TEXAS ATTORNEY GENERAL AND
ZACHOR LEGAL INSTITUTE,
*Appellees.***

On Appeal from the 200th Judicial District Court
of Travis County, Texas, Cause No. D-1-GN-18-006240

**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF OF APPELLANT**

Appellant Qatar Foundation for Education, Science and Community Development respectfully files this Unopposed Second Motion for Extension of Time to File Reply Brief of Appellant. The current deadline for filing the brief is **October 21, 2020**. Appellant requests a **30-day extension** of time for a new deadline of **November 20, 2020**.

The demands of other litigation have necessitated this request. These include:

1. Preparation of a Brief of Appellee in *MP Gulf of Mexico, LLC v. Total E&P USA, Inc.*, No. 12-20-00180-CV, in the Twelfth Court of Appeals, due October 5, 2020;
2. Preparation of Appellant's Reply Brief in *Tex. Disposal Sys. Inc. v. FCCI Ins.*, No. 20-50275, in the Fifth Circuit Court of Appeals, due October 9, 2020;
3. Preparation of Petition for Review in *HEB Grocery Co. v. Peterson*, No. 20-0702, in the Supreme Court of Texas, due October 19, 2020;
4. Assistance with presentation of Oral Argument in *Am. Honda Motor Co. v. Milburn*, No. 05-19-00850-CV, in the Fifth District Court of Appeals at Dallas, on October 20, 2020;
5. Preparation for presentation of Oral Argument in *HouseCanary Analytics, Inc. v. Title Source, Inc.*, No. 19-0673, in the Supreme Court of Texas on October 27, 2020;
6. Preparation of Petition for Review in *USAA Texas Lloyd's Co. v. Griffith*, No. 20-0762, in the Supreme Court of Texas, due November 2, 2020;
7. Preparation of Reply in Support of Petition for Review in *Namdarkhan v. Glast, Phillips & Murray, P.C.*, No. 20-0437, in the Supreme Court of Texas, due November 5, 2020;

8. Preparation of a Brief of Appellees in *Shopoff Advisors, L.P. v. Atrium Circle, GP*, No. 04-20-00310-CV, in the Fourth District Court of Appeals at San Antonio, due November 6, 2020; and

9. Preparation of a Brief of Appellee in *Peacock v. Jackson Walker, LLP*, No. 02-20-00117-CV, in the Second District Court of Appeals at Fort Worth, due November 9, 2020.

Additionally, taking into account the COVID-19 outbreak and the attendant need for working remotely and under certain logistical challenges, Appellant anticipates that it will need 30 additional days to file its reply brief.

This extension is not sought for the purposes of delay, and no party will be prejudiced if it is granted. One prior extension has been granted for this deadline.

As set forth in the Certificate of Conference below, this motion for extension of time is unopposed.

For these reasons, Appellant requests that this Unopposed Second Motion for Extension of Time be granted and Appellant's deadline to file its reply brief be extended 30 days to November 20, 2020.

Respectfully submitted,

/s/ Wallace B. Jefferson

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CERTIFICATE OF CONFERENCE

I certify that on October 7, 2020, I conferred with Kimberly Fuchs, counsel for Appellee Ken Paxton, Texas Attorney General, and Dale Wainwright, counsel for Appellee Zachor Legal Institute, and they each stated that their clients do not oppose the relief sought in this motion for extension of time.

/s/ Anna M. Baker
Anna M. Baker

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2020, a true and correct copy of this motion, including any and all attachments, is served via electronic service through eFile.TXCourts.gov on parties through counsel of record, listed below:

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